

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JENNIFER PARKER

VS.

WAL-MART STORES TEXAS, L.L.C.

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CIVIL ACTION NO: 14-00072

PLAINTIFF'S SECOND AMENDED INITIAL DISCLOSURES

TO: Defendant, Wal-Mart Stores of Texas, LLC, by and through its attorney of record,
John Ramirez, Bush & Ramirez, 24 Greenway Plaza, Suite 1700, Houston,
Texas 77046

COMES NOW, JOLENE ABSHER, Plaintiff in the above-styled and numbered
cause of action and pursuant to Fed. R. Civ. P. 26(a)(1), files the following Initial
Disclosures:

- A) The name, and if known, the address and telephone number of each individual
likely to have discoverable information relevant to disputed facts alleged with
particularity in the pleadings, identifying the subjects of the information:

Jennifer Parker
c/o Jeffrey N. Todd
THE LAW FIRM OF ALTON C. TODD
312 S. Friendswood Drive
Friendswood, Texas 77546
Plaintiff

Wal-Mart Stores Texas, L.L.C.
c/o John Ramirez
Bush & Ramirez
24 Greenway Plaza, Suite 1700
Houston, Texas 77046
Defendant

**Plaintiff's medical providers and their custodians' of records for medical and billing
records:**

Dr. Kevin Varner
Methodist Orthopedics
6550 Fannin Suite 2600
Houston, Texas 77030

**Dr. David Loncarich
Fondren Orthopedics
7401 Main Street
Houston, Texas 77030**

**Dr. David Bloome
Fondren Orthopedics
7401 Main Street
Houston, Texas 77030**

**St. John's Hospital
18300 St. John Drive
Houston, Texas 77058**

**One Step Diagnostic
2401 FM 646 Road West Suite B
Dickinson, Texas 77539**

**Mainland Hospital
6801 Emmett F. Lowry Expressway
Texas City, Texas 77591**

**UTMB Galveston
301 University
Galveston, Texas 77555**

**St. John's Sports Medicine
18100 St. John Drive Suite 100
Houston, Texas 77058**

**Ergo Rehab
10737 Gulf Freeway
Houston, Texas 77034**

**Dr. Jerome Carter
4201 Garth Road Suite 212
Baytown, Texas 77521**

**Dr. Benoy Benny
The Spine Sports Center
2100 West Loop South Suite 150
Houston, Texas 77027**

Dr. Michael Kaldis
Southwest Orthopedic Group
4201 Garth Road Suite 111
Baytown, Texas 77521

Bayport Occupational
1309 W. Fairmont Parkway
La Porte, Texas 77571

- B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody or control of the party that are relevant to disputed facts alleged with particularity in the pleadings:

The following medical and billing records were previously produced:

Document:	Type (Medical/Billing)	Bates No.'s
The Sports Spine Center	Medical	0001-0018
The Sports Spine Center	Billing	0019-0020
Southwest Orthopedics	Medical	0021-0036
Southwest Orthopedics	Billing	0037-0039
Fondren Orthopedics Dr. David Bloome	Medical	0040-0283
Fondren Orthopedics Dr. David Bloome	Billing	0284-0288
Fondren Orthopedics Dr. David Loncarich	Medical	0289-0335
Fondren Orthopedics Dr. David Loncarich	Billing	0336-0338

See attached the following medical & billing records:

Document:	Type (Medical/Billing)	Bates No.'s
One Step Diagnostic	Medical	0339-0341
Mainland Medical	Medical	0342-0380

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

See (B) above.

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

None.

Respectfully submitted,

By: /s/ Jeffrey N. Todd

Jeffrey N. Todd
State Bar No. 24028048
Federal ID No. 1308

ATTORNEYS IN CHARGE FOR PLAINTIFF

OF COUNSEL:

THE LAW FIRM OF ALTON C. TODD
312 S. Friendswood Drive
Friendswood, Texas 77546
(281) 992-8633
(281) 648-8633 Facsimile No.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to all known counsel of record and other entities and individuals as reflected below, on this the 30th day of June 2014 via the method(s) indicated:

John A. Ramirez
BUSH & RAMIREZ
24 Greenway Plaza, Suite 1700
Houston, Texas 77046

Via E-File

/s/ Jeffrey N. Todd

Jeffrey N. Todd